



ARKANSAS
Department of Environmental Quality

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SUPERFUND DIV.
DIRECTOR'S OFFICE

MEMORANDUM

TO: Ryan Benefield, Chief, HWD

THRU: Melanie Foster, Enforcement & Inspection Branch Manager, HWD *MF*

FROM: Penny J. Wilson, Inspector Supervisor, HWD *PJW*
Les Branscum, Inspector, HWD *LB*

DATE: September 4, 2007

SUBJECT: Diaz Intermediates Corporation
ARR000005843
AFIN 18-00401

Diaz Intermediates Corporation (Diaz) is located at 301 Wyanoke Road in West Memphis, Arkansas. Diaz is a supplier of high purity halogenated fine organic chemicals which uses bromine as the primary raw material in the production of its products which are intermediates to the chemical industry. The West Memphis plant was built in 1998 and occupies a 10 acre site consisting of the process area, two (2) tank farms, Quality Control and Process Development laboratory, warehouse, and offices. Diaz is located in an industrial area of West Memphis and is bordered by Stateside Steel & Wire to the South, Tetra Technologies to the East, Allied Universal Corporation to the Northeast and an empty field to the West. (Refer to Attachment #1 for an aerial map.) Near the end of July, Diaz shut the operations down and the property is currently abandoned. Diaz previously notified as a large quantity generator of hazardous waste.

As you are aware, James Luker is the Trustee for Diaz and expected to receive the keys to the site during the week of August 20, 2007. On August 22, 2007, Les Branscum and I met Brent Walker, Water Inspector, at the site to see if we could gain access to the site. All entrances to the site were locked. Mr. Luker had not received the keys to the site so we could not gain access. However, we were able to walk the perimeter of the fenced area and determined there were no visible areas where releases were occurring or had occurred. Refer to Attachment #2 for photographs from the August 22, 2007 site visit.

Mr. Luker received the keys to the site on Friday, August 24, 2007 and we arranged to meet at the site on Tuesday, August 28, 2007. When we arrived at the site, we met Brent Walker, Mr. Luker, and Ron Reid, former Diaz employee. We informed Mr. Luker that we intended to look around the site, try to inventory the items in each area, and identify any areas for potential

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releases or where any releases may have occurred. Mr. Reid informed us that any containers that had a designation of "WP", "HP", or "P" would be considered finished product. All other container labeling would indicate a pre-cursor product and would only be good for the manufacturing of Diaz's products; these could not be used without further processing and would therefore be considered waste.

There are ten (10) areas at the site where various containers are being stored plus the process area where all the process equipment is located. Refer to Attachment #3 for a site map and a list of the approximate number and type of containers for each location. Refer to Attachment #4 for photographs of the August 28, 2007 site visit.

Even though there are numerous containers of different type materials on-site, we only observed one (1) 55-gallon container that had leaked. (Refer to Attachment #4, Photographs #52 and #53.) This container was labeled Bromobenzene and the area where the leak occurred is now covered with a crystal-like substance.

cc: Brent Walker, Water Inspector, Jonesboro Field Office

 Allied Universal Corporation

 Tetra

 Diaz Intermediates

 Stateside Steel & Wire

Image © 2007 DigitalGlobe





Pointer 35°06'25.86" N 90°11'33.42" W elev 213 ft

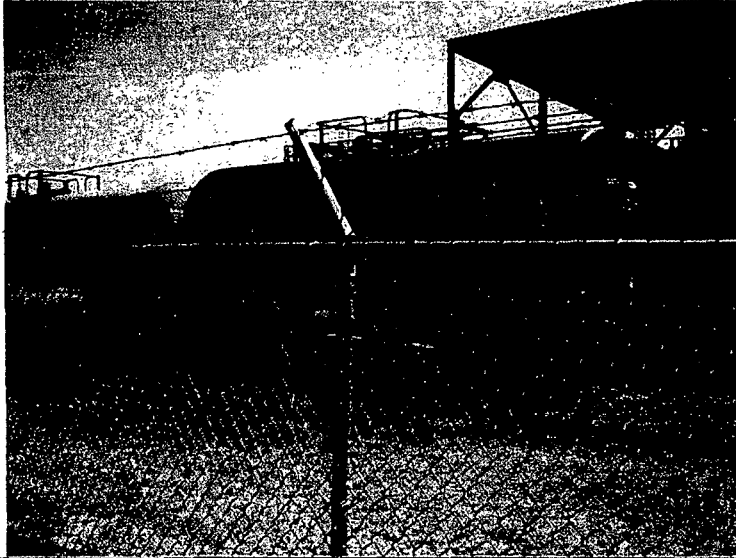

Streaming ||||| 100%

Eye alt 2412 ft

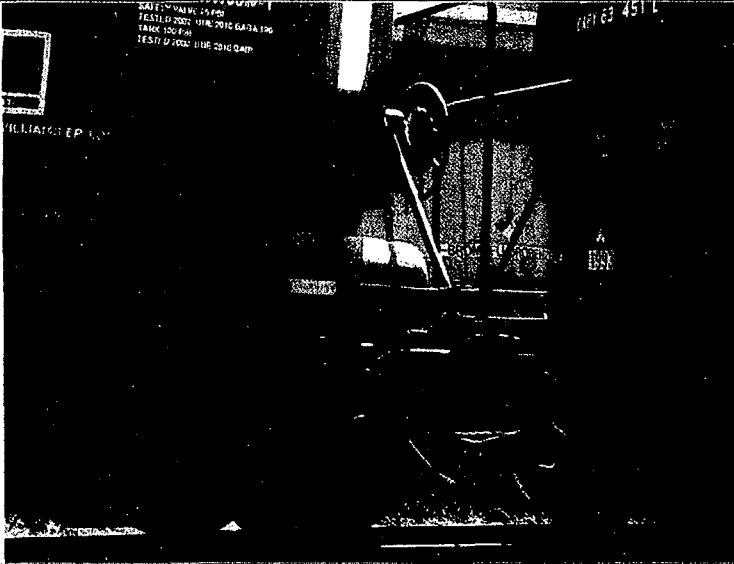
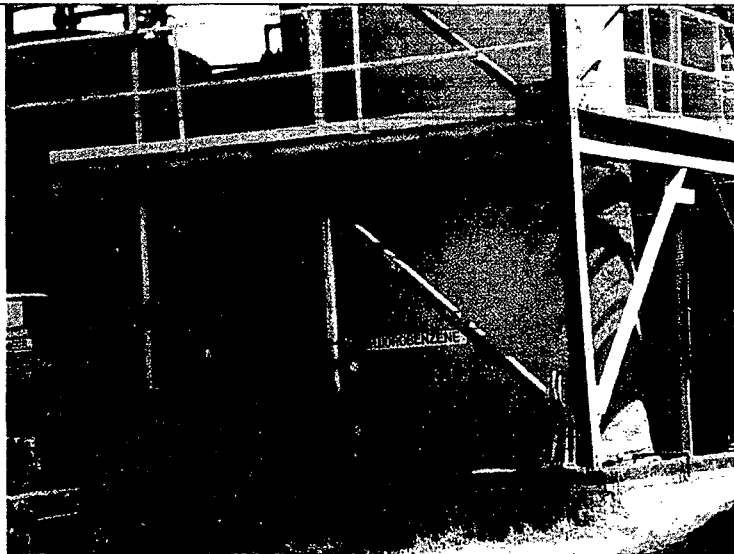
Attachment #2

August 22, 2007 Photographs



Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	1	Of	10		Date:	22 AUG 07	Time: 1105
Description:	View of Diaz rail spur from outside facility fence, west side. Rail car is placarded Flammable Liquid, UN 1993.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	2	Of	10		Date:	22 AUG 07	Time: 1107
Description:	View of Diaz facility from NW corner on rail spur. Rail car is placarded Flammable Liquid, UN2387 and labeled Fluorobenzene.						
							

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ			Witness:	Penny Wilson, ADEQ		
Photo #	3	Of	10	Date:	22 AUG 07	Time:	1122
Description:	View of P-Bromofluorobenzene tank through the fence on the west side of the Diaz facility.						
							
Photographer:	Les Branscum, ADEQ			Witness:	Penny Wilson, ADEQ		
Photo #	4	Of	10	Date:	22 AUG 07	Time:	1123
Description:	Fluorobenzene tank as viewed through the fence on the west side of the facility, (tank in above photo is to the left). Both photos are facing east.						
							

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	5	Of	10		Date:	22 AUG 07	Time:	1108
Description:		View of west side of drum storage pad at north end of property, facing south.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	6	Of	10		Date:	22 AUG 07	Time:	1108
Description:		View to left of above photo looking into the facility.						
								

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

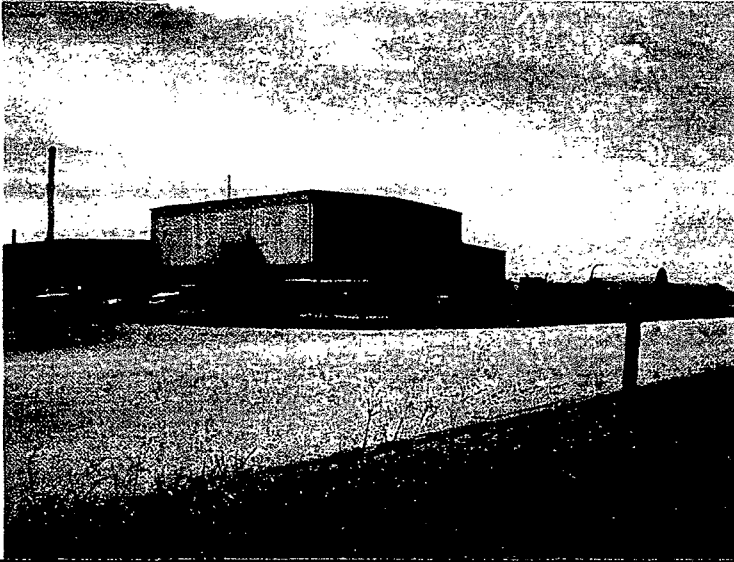
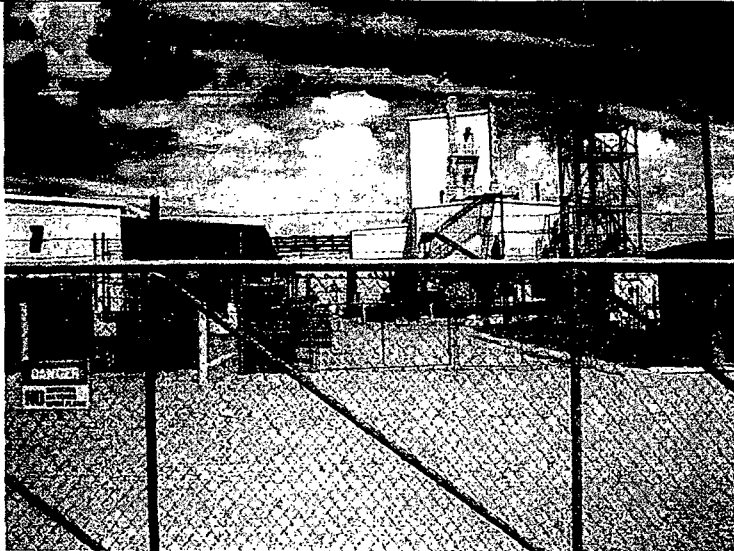
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	7	Of	10		Date:	22 AUG 07	Time: 1145
Description:	Photo of front gate showing warning signs and secondary entrance in background, facing north.						



Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	8	Of	10		Date:	22 AUG 07	Time: 1146
Description:	Diaz facility sign with the Tetra facility in the background to the east.						



**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

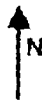
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	9	Of	10		Date:	22 AUG 07	Time:	1146
Description:	View from front of Diaz property showing Diaz mail box and Stateside Steel & Wire to the south.							
								
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	10	Of	10		Date:	22 AUG 07	Time:	1148
Description:	View from street into Diaz facility showing the Production building in background and warehouse to the left.							
								

Attachment #3

Site Map & List of Containers

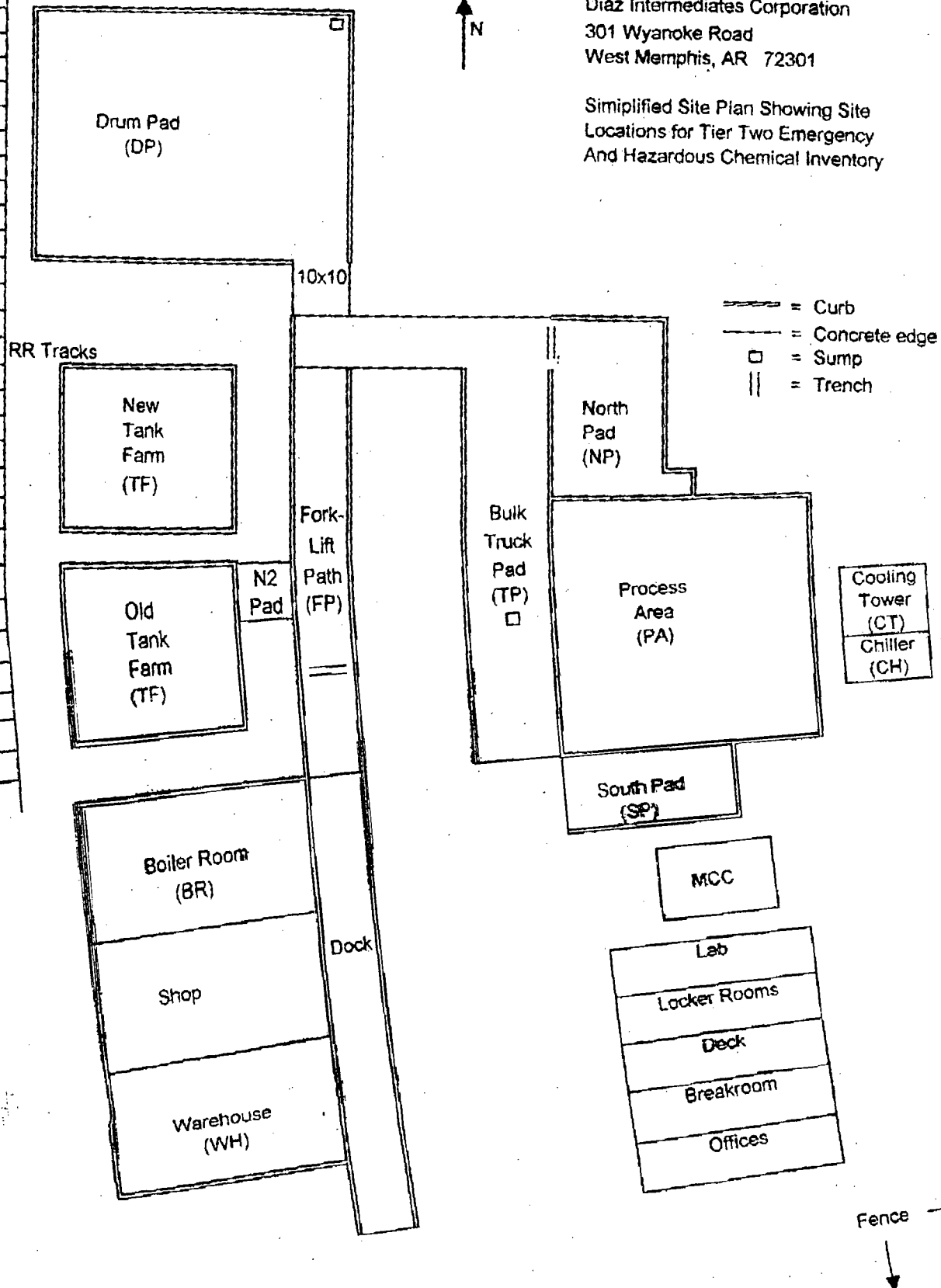
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Diaz Intermediates Corporation
301 Wyanoke Road
West Memphis, AR 72301

Simplified Site Plan Showing Site
Locations for Tier Two Emergency
And Hazardous Chemical Inventory



Diaz Intermediates Corporation

August 28, 2007
Estimated Inventory

Warehouse

Unused Products

n-Propional – 4, 55-gallon poly drums & 6, 275-gallon totes
Aluminum Chloride, Anhydrous – 32, 30-gallon metal drums
Methanol – 33, 55-gallon metal drums
Hydrobromic Acid – unknown number of 55-gallon drums
Red Phosphorus – 2, 5-gallon metal drums
Ferric Chloride – 12, 65lb. metal drums

Finished Products

p-Dibromobenzene – 14 pallets of 5-gallon pails (504 pails)
Ortho-Bromofluorobenzene – 4 pallets of 5-gallon pails (144 pails)
m-Bromonitrobenzene – 11, 300-gallon totes
p-Bromochlorobenzene – 5 pallets of 5-gallon pails (180 pails)
n-Propyl Bromide (Pure) – 12, 275 gallon totes

The following items are partial drums of product used by the lab for sample purposes:

N-Heptylbromide
m-Fluorobenzaldehyde
o-Bromochlorobenzene
m-Bromophenol
2-Bromopyridine
p-Fluoroanisole
m-Dibromobenzene

Materials for Further Processing

2-Bromo pyridine (tech grade) – 20, 55-gallon metal drums
Di-Bromobenzene(R) – 23, 55-gallon metal drums

Waste

"Hazardous Waste" – 1, 55-gallon poly drum without accumulation start date
"Flammable Haz Waste Tol (R) Spill 8/18/06" – 1, 55-gallon poly drum

Ramp on the East Side of the Warehouse

Caustic Soda 50% - 3, 275-gallon totes
Non-Hazardous Waste – 12, 55-gallon poly drums
m-Bromofluorobenzene 65% Crude – 4, 55-gallon poly drums
Bromofluorobenzene Isomer Mid (Mud) – 4, 55-gallon poly drums

Bromotoluene (Crude) – 4, 55-gallon poly drums dated January 2006
x-Bromotoluene Bottoms – 3, 55-gallon poly drums
x-Bromotoluene Crude – 9, 55-gallon poly drums
x-Bromotoluene Crude – 9, 55-gallon poly drums dated 2006
DBFB/Dibromotoluene Mix – 22, 55-gallon poly drums
m-Bromofluorobenzene 99% Technical – 13, 55-gallon poly drums dated July 2005

Forklift Path

m-Bromofluorobenzene 65% Crude – 4, 275-gallon totes
(WP) MBFB65 – 8, 55-gallon poly drums
Area "A" Pit Water (Zinc) 4, 275-gallon totes
DBFB/Dibromotoluene Mix – 12, 55-gallon poly drums
DBT(H) – 4, 55-gallon poly drums
x-Bromotoluene(T) Bottoms – 4, 55-gallon poly drums

Pad East of New Tank Farm

DBFB/Dibromotoluene Mix – 8, 55-gallon poly drums
Waste Pads/Filters MBFB – 3, 55-gallon poly drums
Zinc Recovery Solids/Mud
Zorb-All/MBFB65 Clean-up
(WP) MBFB65 – 3, 55-gallon poly drums
Mixed Organics (R) Overhead – 4, 55-gallon polys
Methanol, 4, 55-gallon poly drums
MBFB(H) Nondistilled Water – 4, 55-gallon poly drums dated 6-2-06
MBFB(H) Overhead Water – 4, 55-gallon poly drums dated May 2006
x-Bromotoluene (T) Bottoms – 48, 55-gallon poly drums
x-Bromotoluene (C) Crude – 7, 55-gallon poly drums

Old Tank Farm

Tank IT01 – Benzene, 8500 gallon stainless steel tank
Tank IT02 – Aqueous Waste, 10000 gallon fiberglass tank
Tank IT03 – p-Bromofluorobenzene (PBFB) 8500 stainless steel tank
Tank IT04 – Hydrobromic Acid, 10000 gallon fiberglass tank

There is a sump that runs along the North wall of the secondary containment for this tank farm. The sump is covered with a metal grating that is extremely deteriorated. At the time of the site visit there was liquid in the sump that had a pH of 6.

New Tank Farm

Tank IT05 - Hydrobromic Acid, 10000 gallon fiberglass tank
Tank IT06 - Hydrobromic Acid, 10000 gallon fiberglass tank
Tank IT07 - Hydrobromic Acid, 10000 gallon fiberglass tank
Tank IT08 - Hydrobromic Acid, 10000 gallon fiberglass tank

There is an accumulation of some type of liquid with a crystal-like substance on top on the southern end of the secondary containment for this tank farm. The pH of the liquid was between 9 and 10.

Drum Pad

Labels on drums include the following: x-Bromotoluene Bottoms May 2006; Process Tars DBFB/Dibromotoluene Mix; p-Bromoanisole (Recycle); Bromobenzene (Recycle); Propyl Bromide (Tech); HCl/HBR Mix SG >1.1 January 31, 2006; Methanol; MBFB (H) Nondistilled Water; (WP) m-bromoanisole (Wet/Pure); (HP) m-Bromoanisole (High Purity); (WP) Toluene (Wet/Pure); Bromofluorobenzene Recycle; Fractionation; Toluene Recycle; m-Bromofluorobenzene

583, 55-gallon poly drums (5 without labels)
3, 85-gallon overpack drums
65, 275-gallon totes
56, 55-gallon Non-Hazardous Waste poly drums

NOTE: One (1) 55-gallon poly drum of Bromobenzene was found to be leaking at the bottom of the drum with a crystal-like material at the leak.

North Pad

Labels on drums include the following: p-Bromoanisole (Wet/Pure); Mixed Organics Neutralized; Mixed Organics Overhead Water; Bottom Purge Drum 2/18/07

71, 55-gallon poly drums
2, 275-gallon totes

Bulk Truck Pad

Labels on drums include the following: x-Bromotoluene(T)Bottoms; DBFB/Dibromotoluene Mix; Process Tars DBFB/Dibromotoluene Mix; (WP) Toluene Wet Pure; Process Tars; Hydrobromic Acid 48% Bottoms from 2BP; Hydrobromic Acid 7/19/05; n-Amyl Alcohol Recovered 2/21/06; n-Amyl Bromide (Technical) 2/16/06

193, 55-gallon poly drums
9, 275-gallon totes
1, 85-gallon overpack drum
1, 5-gallon pail

South Pad

Labels on drums include the following: DBFB/Dibromotoluene Mix 11/8/06; x-Bromotoluene (C) Crude 3/7/06; MBFB (H) Nondistilled Water; Methanol

53, 55-gallon poly drums
4, 275-gallon totes

Rail Spur

Railcars 23500 gallons with Flammable Liquid placard UN1993
 23500 gallons stenciled "Ext. Coating Sherwin Williams Epoxy"
 23500 gallons with Flammable Liquid placard UN2387



There are a total of 2235 containers of material on-site. The following is a breakdown of those containers:

*5-gallon pails = 843
30-gallon drums = 32
55-gallon drums = 1233
85-gallon drums = 4
275- or 300- gallon totes = 120
Railcars = 3*

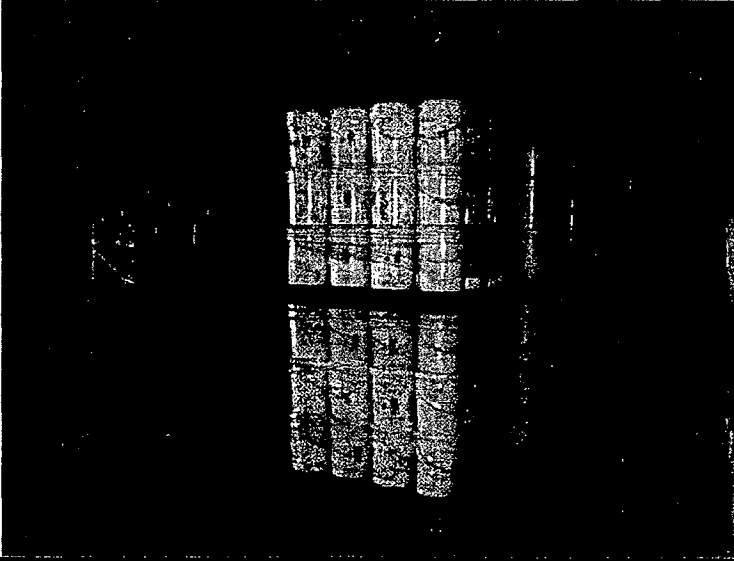

Attachment #4

August 28, 2007 Photographs

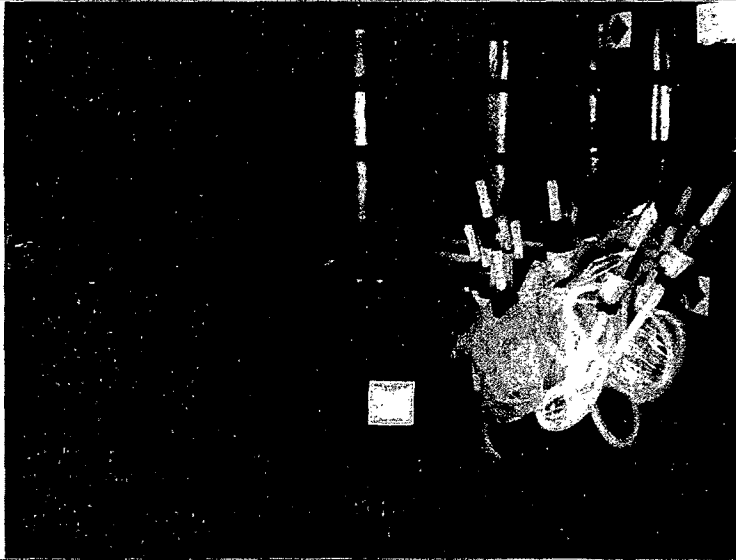
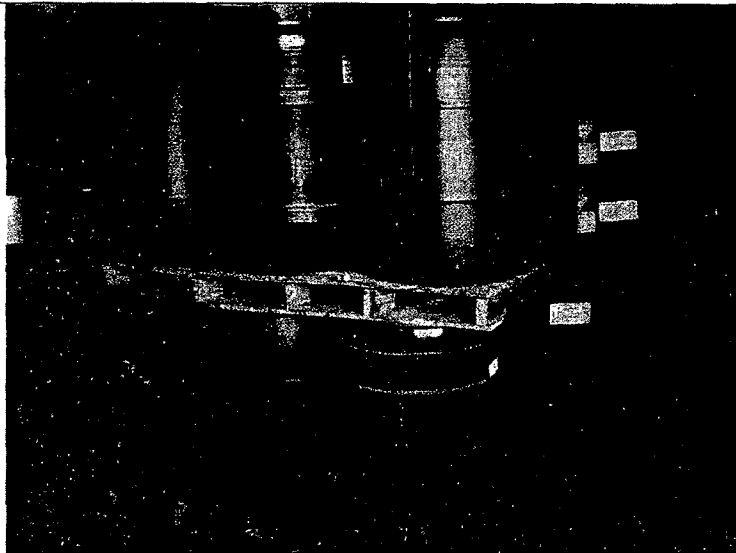
Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	1	Of	67		Date:	28 AUG 07	Time: 1038
Description:	SW corner of the Diaz warehouse. On the right are 5 gal pails of P-Dibromobenzene (99%) and the 55 gal blue drums contain 2-Bromopyridine. Photo facing south.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, (ADEQ)	
Photo #	2	Of	67		Date:	28 AUG 07	Time: 1043
Description:	Items to the left of those in photo #1 include black 55 gal drums and 275 gal totes of n-Propanol (fresh). The 300 gallon plastic wrapped totes on the left are empty.						
							


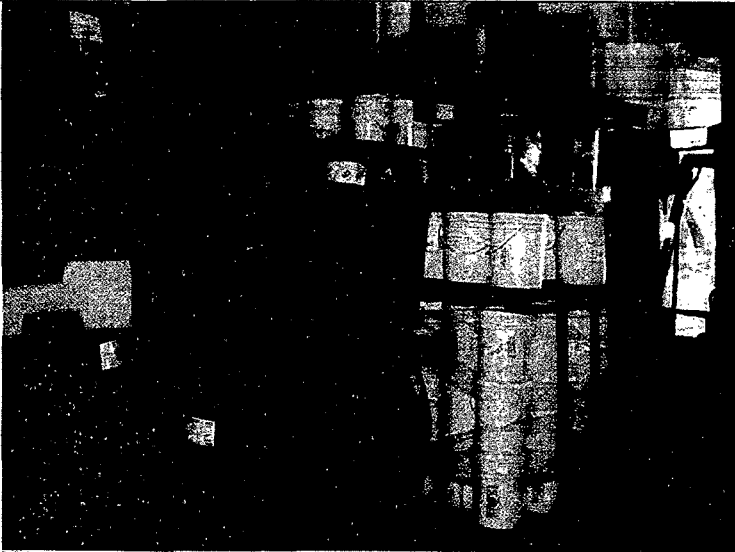
Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	3	Of	67		Date:	28 AUG 07	Time:	1047
Description:		Facing south in the Diaz warehouse. These are 5 gal pails of P-Dibromobenzene (99%). Containers on top of pails are empty. These items are to the left of those in photos 1 & 2.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	4	Of	67		Date:	28 AUG 07	Time:	1050
Description:		Drums to the left of those in photo 3; black 30 gal drums of Aluminum Chloride, Anhydrous and blue 55 gal drums of Methanol.						
								


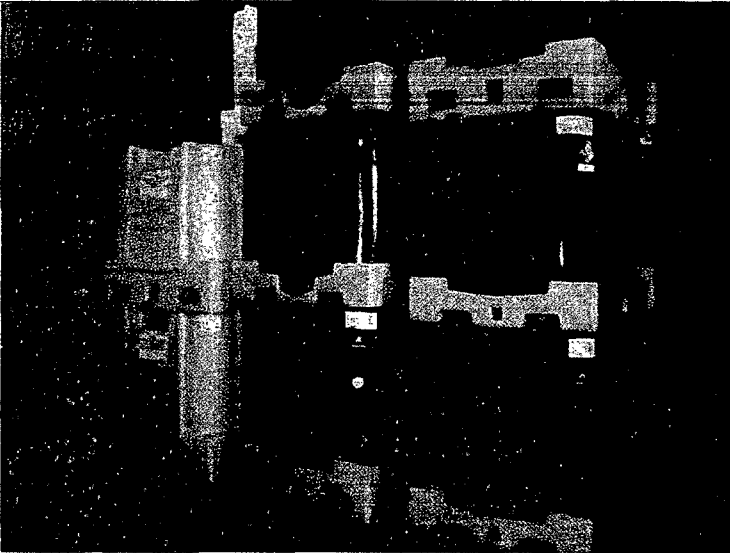
Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	5	Of	67		Date:	28 AUG 07	Time: 1054
Description:	Southeast corner of the Diaz warehouse. Items in foreground are drum pumps with one drum of hazardous waste Benzene behind them. Drums stacked 2 high are Di-Bromobenzene (R).						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	6	Of	67		Date:	28 AUG 07	Time: 1059
Description:	North wall, east side of warehouse. Labeled containers at back right are 55 gal drums of M-Fluorobenzaldehyde on the bottom and 2 kilo containers of M-Bromophenol and 2-Bromopyridine on top pallet.						
							

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet


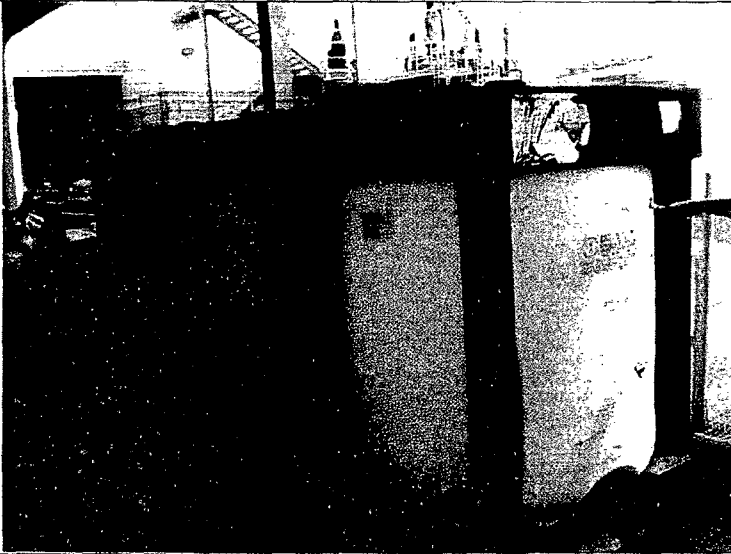
Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	7	Of	67		Date:	28 AUG 07	Time:	1103
Description:		Northwest view of north wall, Diaz warehouse. 300 gal white totes contain M-Bromoanisole (high purity).						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	8	Of	67		Date:	28 AUG 07	Time:	1106
Description:		North wall of warehouse, opposite side of totes in photo 7. 5 gal white pails contain P-Bromochlorobenzene. Blue pails on top of these are labeled P-Dibromobenzene.						
								

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet


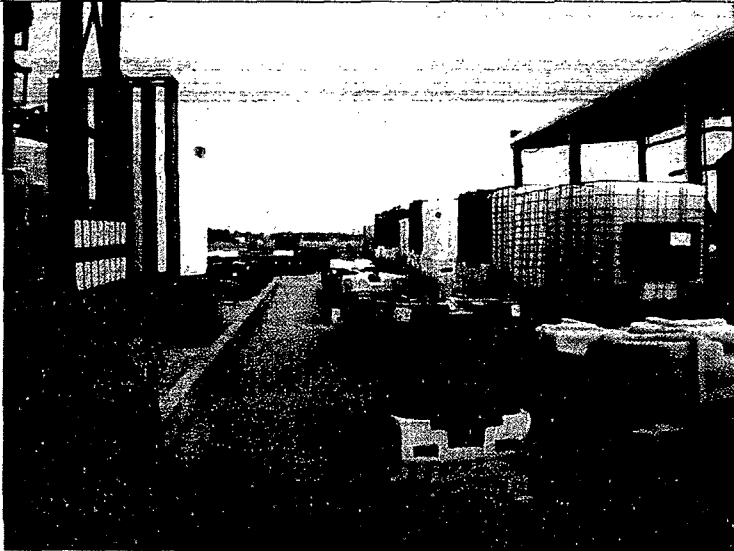
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	9	Of	67		Date:	28 AUG 07	Time: 1111
Description:	Two 5 gal cans on top of the stack in photo 8. These are labeled 'Phosphorus, Amorphous- Red Phosphorous (99%)'.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	10	Of	67		Date:	28 AUG 07	Time: 1114
Description:	Northwest corner of warehouse, 275 gal blue totes labeled N-Propylbromide.						
							

Arkansas Department of Environmental Quality (ADEQ)



Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	11	Of	67		Date:	28 AUG 07	Time: 1118
Description:	Northwest corner of Diaz warehouse showing 220 gal totes of N-Propylbromide and black 65 lb cans of Ferric Chloride.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	12	Of	67		Date:	28 AUG 07	Time: 1122
Description:	275 gal totes on the loading dock, east side of the warehouse facing NE. Totes contain Caustic Soda (50%).						
							


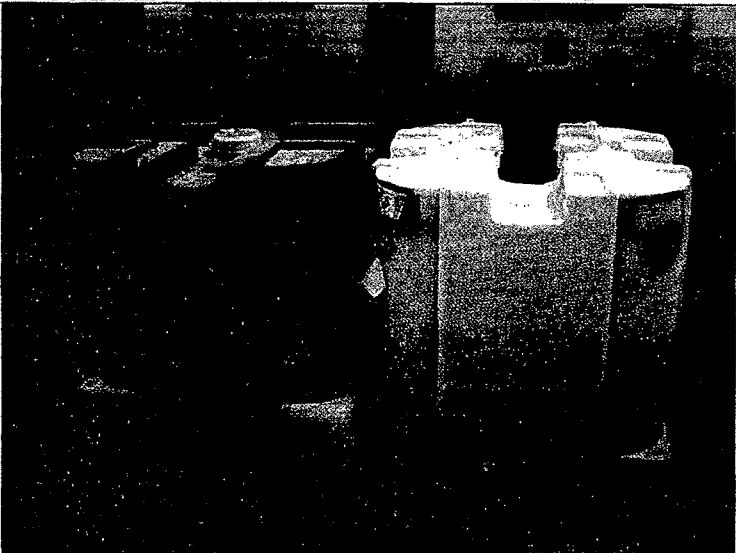
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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	13	Of	67		Date:	28 AUG 07	Time:	1124
Description:		View of loading dock on east side of warehouse facing north. Approx. 12 non hazardous blue drums are on the dock.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	14	Of	67		Date:	28 AUG 07	Time:	1127
Description:		Forklift path on north end of loading dock facing north. Above ground tanks in containment are to the left.						
								

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**


Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	15,16	Of	67		Date:	28 AUG 07	Time:	1135
Description:		Close up of label on drum of Bromotoluene (C) showing date of 1-11-06. This drum was on the right side of the loading dock adjacent to the warehouse. Photos 15&16 were of the same label.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	17	Of	67		Date:	28 AUG 07	Time:	1138
Description:		North end of the loading dock showing the condition of some of the poly drums. These drums were filled while the contents were hot, causing them to indent.						
								

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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	18	Of	67		Date:	28 AUG 07	Time:	1150
Description:		Facing north on the forklift pad. Eight 55 gal drums labeled 'MBFB65 (WP) (WET PURE)'.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	19	Of	67		Date:	28 AUG 07	Time:	1153
Description:		275 gal totes to the left of the drums in photo 18 labeled M-Bromofluorobenzene 65%.						
								

Arkansas Department of Environmental Quality (ADEQ)



Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	20	Of	67		Date:	28 AUG 07	Time: 1155
Description:	275 gal totes on right side of forklift path, facing NE. The blue tote is labeled M-Bromofluorobenzene; white ones contain pit water (zinc).						
							

Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	21	Of	67		Date:	28 AUG 07	Time: 1157
Description:	Continuing north on the right side of the fork lift path, stand of 55 gal drums. Labels on drums at right read 'DBFB Dibromotoluene Mix'.						



							
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Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet


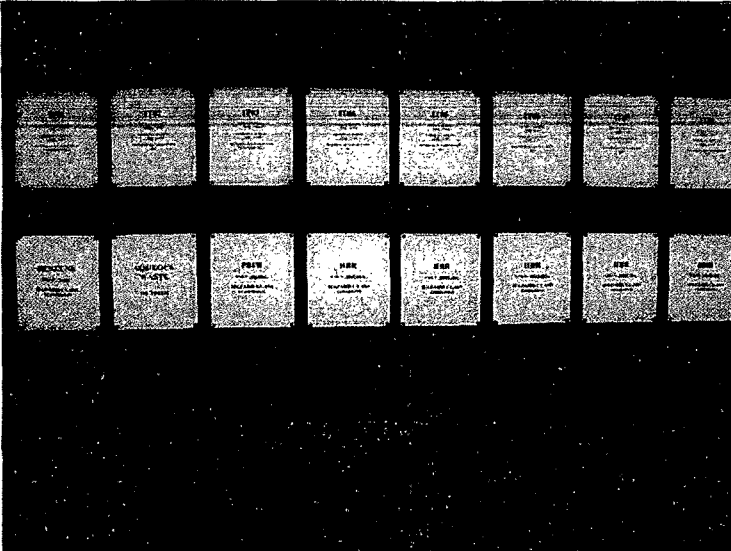
Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	22	Of	67		Date:	28 AUG 07	Time:	1159
Description:		Left side of forklift path facing north. The eight 55 gal drums centered in the photo are all labeled 'DBFB, Dibromotoluene Mix'.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	23	Of	67		Date:	28 AUG 07	Time:	1202
Description:		Drums just north of those in photo 22. Blue drum to the left is labeled 'MBFB Waste pads/filters'. New and old tank farms are to the left of the photo.						
								

Arkansas Department of Environmental Quality (ADEQ)


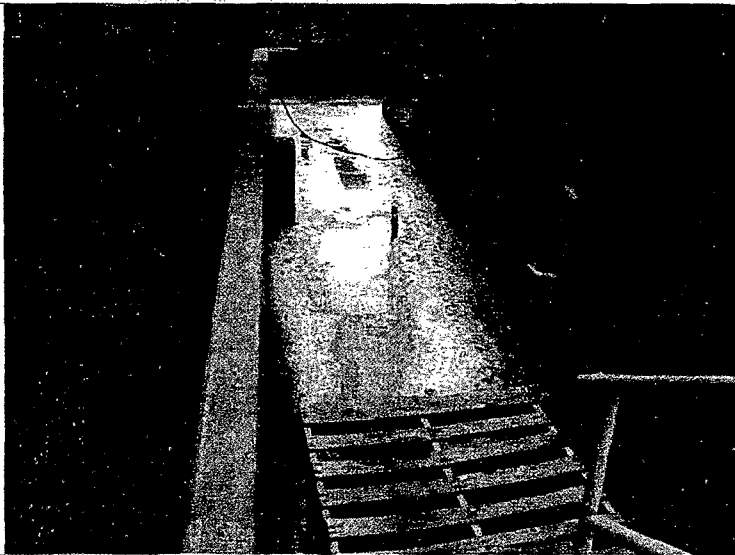
Official Photograph Sheet

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	24	Of	67		Date:	28 AUG 07	Time:	1204
Description:	Drums on pad east of 'tank farm', facing NW. Drum on left is labeled 'Mixed Organics (R) Overhead'.							
								
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	25	Of	67		Date:	28 AUG 07	Time:	1212
Description:	Opposite view of drums in photo 24, facing SW with tank farm in background. Last 4 drums on the end of the left row and 2 rows to the right are labeled X-Bromotoluene (T) Bottoms.							
								

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

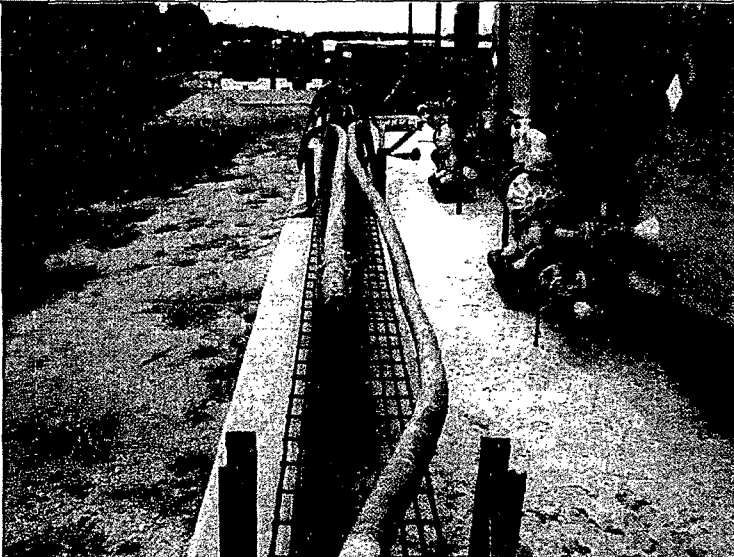
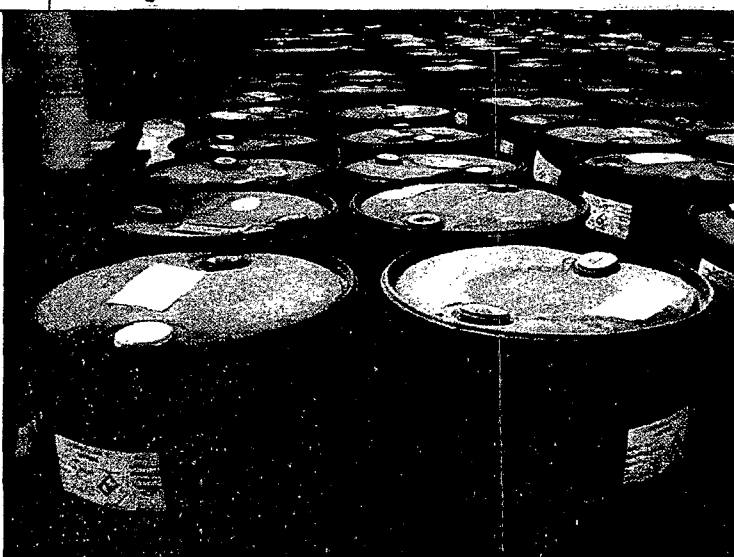
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	26	Of	67		Date:	28 AUG 07	Time: 1215
Description:	Drums of X-Bromotoluene (C) Crude on opposite end of drums in photo 25, facing south.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	27	Of	67		Date:	28 AUG 07	Time: 1319
Description:	Explanation board in front of the old and new 'tank farms', facing west.						
							

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Official Photograph Sheet

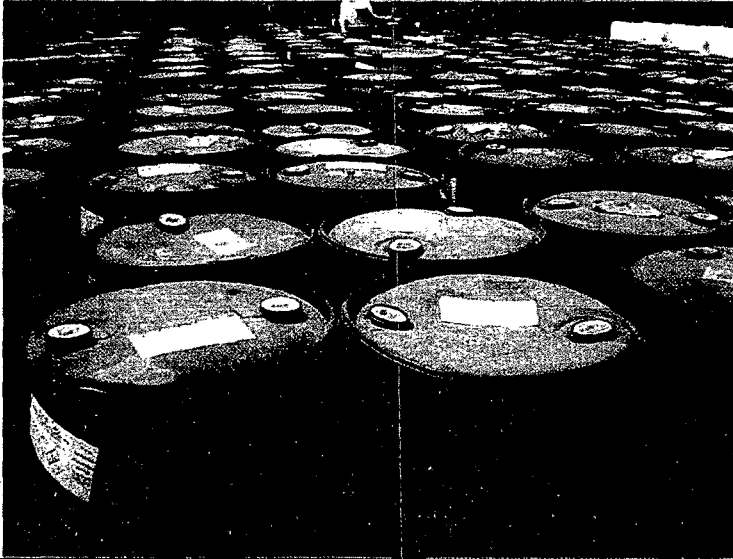

Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	28	Of	67		Date:	28 AUG 07	Time:	1328
Description:		North side of containment sump in old tank farm. Spilfyter test strip indicated a Ph of 6 in the sump water.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	29	Of	67		Date:	28 AUG 07	Time:	1331
Description:		New tank farm containment area with standing water. The Spilfyter test strip indicated the Ph for this water between 9 and 10.						
								

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Official Photograph Sheet

Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	30	Of	67		Date:	28 AUG 07	Time:	1336
Description:		West side of containment in photo 29 showing bare dirt adjacent to containment area.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	31	Of	67		Date:	28 AUG 07	Time:	1346
Description:		First 2 rows of drums on drum pad north of the tank farms, facing west. The 2 drums in the foreground are labeled 'X-Bromotoluene (T) Bottoms'. Yellow salvage drums can be seen in the background.						
								



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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	32	Of	67		Date:	28 AUG 07	Time:	1348
Description:		Next 2 rows (row 3&4) of drums on drum pad north of the tank farm, facing west. Drum in left foreground is labeled Dibromotoluene.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	33	Of	67		Date:	28 AUG 07	Time:	1352
Description:		Rows 5&6 on the drum pad, facing west.						
								

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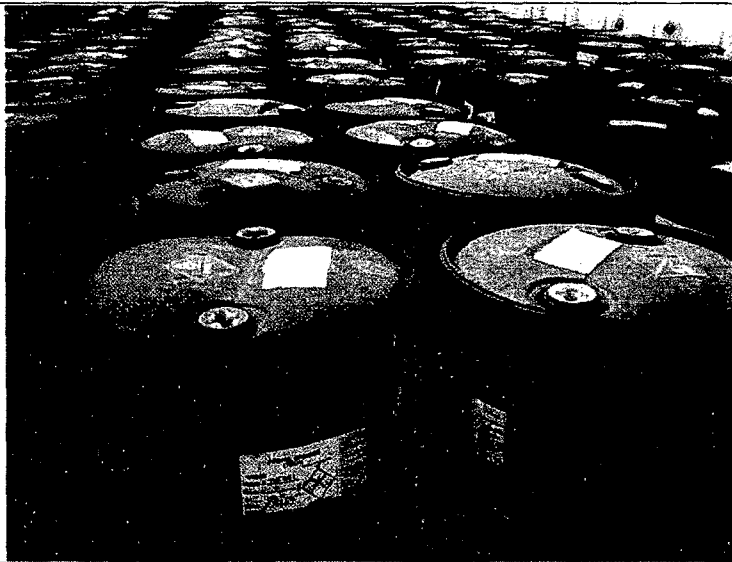
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	34	Of	67		Date:	28 AUG 07	Time: 1354
Description:	View of rows 5&6 from opposite end showing blue drum on right has a bulging top. Drum is labeled 'M-Dibromobenzene'. Photo facing east.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	35	Of	67		Date:	28 AUG 07	Time: 1358
Description:	Poly drum (3 rd from end in above photo of row 6) not leaking but crushed in, no label visible. Photo facing east.						
							

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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	36	Of	67		Date:	28 AUG 07	Time:	1402
Description:		Rows 7&8 on drum pad, facing west. Rail car in background is labeled 'Fluorobenzene' UN 2387, Flammable Liquid.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	37	Of	67		Date:	28 AUG 07	Time:	1403
Description:		Residue on top of 2 nd drum in row 8, photo 36. Drum is labeled 'Bromobenzene recycle'.						
								

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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	38	Of	67		Date:	28 AUG 07	Time:	1405
Description:		Rows 9&10 on drum pad, facing west. Labels on first two drums indicate they contain '--Propyl Bromide (Tech)'.						





Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	39	Of	67		Date:	28 AUG 07	Time:	1406
Description:		Rows 11&12 on drum pad, facing west. First drum in row 12 is labeled 'HCL/HBR mix SG>1.1'. It is also dated 1-31-06.						



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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	40	Of	67		Date:	28 AUG 07	Time:	1408
Description:		Bulging lid on corrosive labeled drum in row 11. Product label indicates the drum contains 'HCL/HBR mix HG>1.1', DATED 1-21-07.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	41	Of	67		Date:	28 AUG 07	Time:	1409
Description:		Rows 13&14 on drum pad, facing west.						
								

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Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	42	Of	67		Date:	28 AUG 07	Time: 1410
Description:	Row 15 on drum pad, facing west. Totes are labeled 'Methanol'.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	43	Of	67		Date:	28 AUG 07	Time: 1412
Description:	Row 16 facing west, drum in front is labeled 'MBFB(H) Nondistilled Water'						
							

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Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	44	Of	67		Date:	28 AUG 07	Time: 1413
Description:	Row 17 facing west, majority of row is totes two drums wide.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	45	Of	67		Date:	28 AUG 07	Time: 1416
Description:	Row 18 facing west, front drum is labeled 'Bromobenzene PDBB-Extraction'.						
							

Arkansas Department of Environmental Quality (ADEQ)
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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	46	Of	67		Date:	28 AUG 07	Time:	
Description:		Row 19 facing west. Blue drum is labeled 'Bromobenzene Pot Bottoms'.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	47	Of	67		Date:	28 AUG 07	Time:	
Description:		Row 20 facing west on drum pad. Drums in front are labeled 'm-Bromofluorobenzene Recycle'.						
								



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Official Photograph Sheet


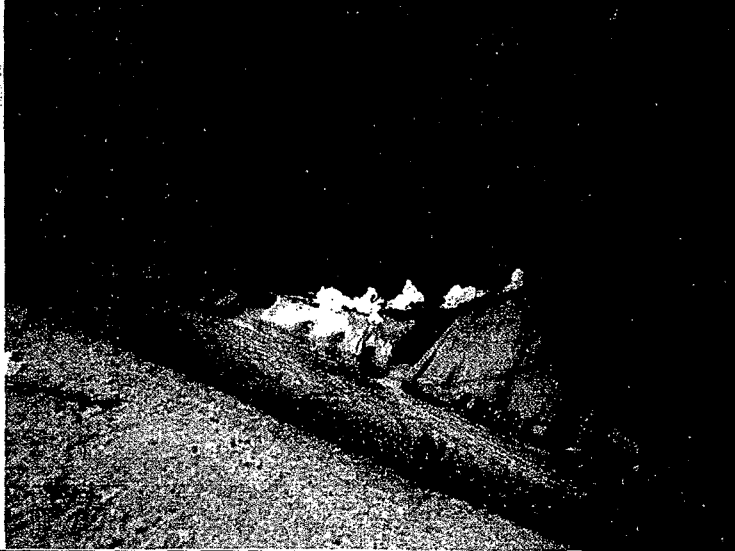
Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301					
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ
Photo #	48	Of	67		Date:	28 AUG 07	Time: 1423
Description:		Last rows on drum pad progressing from south to north. Photo is facing NW.					
							
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ
Photo #	49	Of	67		Date:	28 AUG 07	Time: 1425
Description:		Drum in upper left corner of photo 48 that appeared black with a blue lid. Drum is discolored by contents. Label indicates contents are 'Fluorobenzene (Recovered) Acidic' and dated 6-30-07.					
							

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Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	50	Of	67		Date:	28 AUG 07	Time: 1426
Description:	Drums at east end of drum pad, facing north. Drum to right is labeled 'MBFB Nondistilled Water'						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	51	Of	67		Date:	28 AUG 07	Time: 1431
Description:	Drums on East end of drum pad, (drums in photo 50 are in upper left corner) majority are non-hazardous.						
							

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Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	52	Of	67		Date:	28 AUG 07	Time: 1434
Description:	Leaking drum on right side of drums in photo 51.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	53	Of	67		Date:	28 AUG 07	Time: 1434
Description:	Close up of leaking drum showing salt like crystals that have formed around the damaged base of the drum. The leaking material had solidified by the time of the photo, no liquid was seen.						
							

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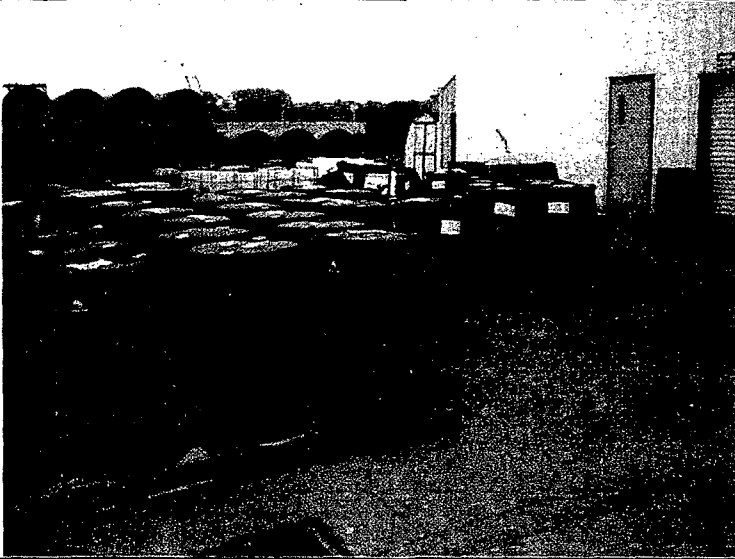

Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	54	Of	67		Date:	28 AUG 07	Time: 1437
Description:	Close up of label on damaged drum. Label indicates contents are 'Bromobenzene (Z) with high DBB/TBB'.						




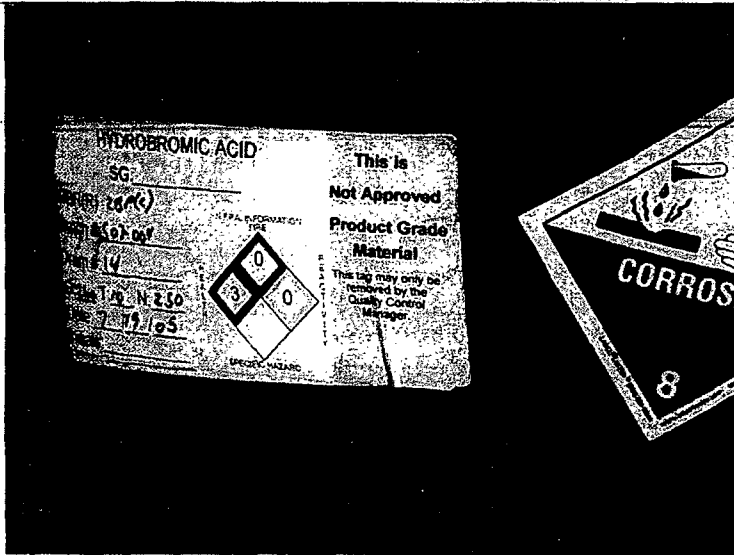
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	55	Of	67		Date:	28 AUG 07	Time: 1439
Description:	North pad, east of previous photos and facing east showing full drums in foreground and empties stacked on their side in background.						





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Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	56	Of	67		Date:	28 AUG 07	Time: 1439
Description:	Continuation of drums in photo 55, facing east. Process Building is to the right in background.						
							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ	
Photo #	57	Of	67		Date:	28 AUG 07	Time: 1443
Description:	Drums on Bulk Truck Pad, facing south. Process Building is to the left.						
							

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet


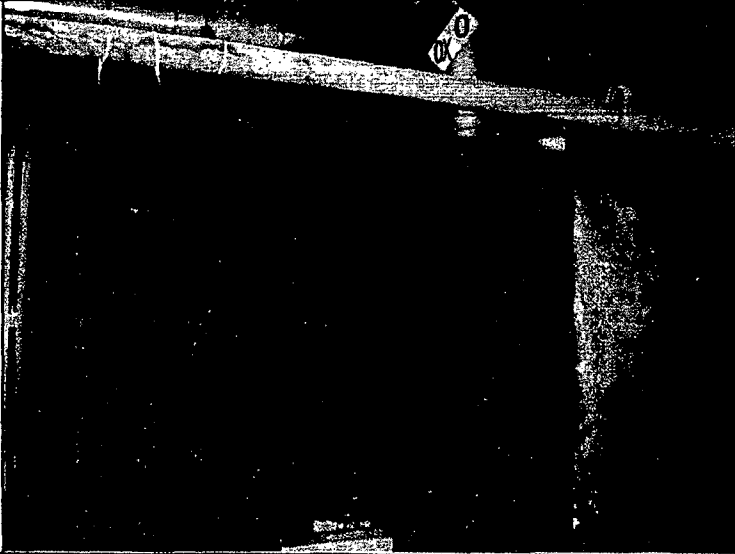
Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	58	Of	67		Date:	28 AUG 07	Time:	1448
Description:		Drum labeled 'Hydrobromic Acid' at south end of Bulk Truck Pad.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	59	Of	67		Date:	28 AUG 07	Time:	1448
Description:		Close up of drum in photo 58 showing date of 7-19-05.						
								

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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301						
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	60	Of	67		Date:	28 AUG 07	Time:	1451
Description:		View of South Pad south of Process Building, facing east.						
								
Photographer:		Les Branscum, ADEQ			Witness:		Penny Wilson, ADEQ	
Photo #	61	Of	67		Date:	28 AUG 07	Time:	1456
Description:		Facing east from south end of Process Building, (inside) showing one of the 2000 gal reaction vessels.						
								

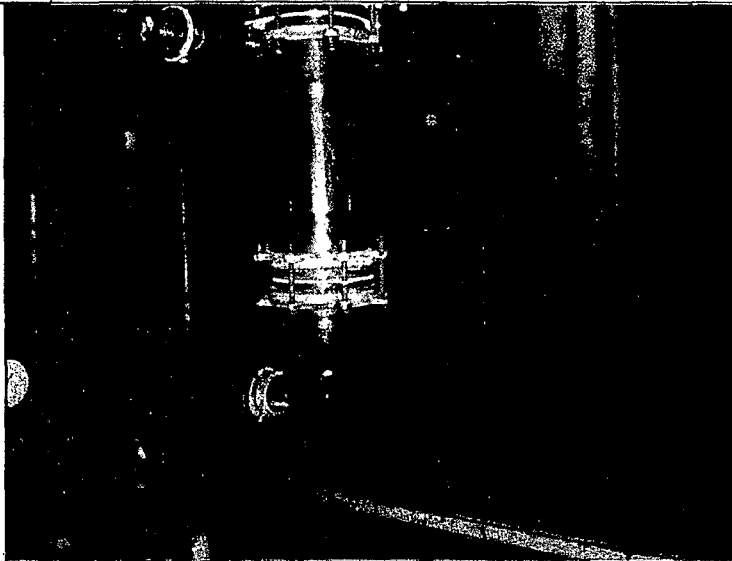
Arkansas Department of Environmental Quality (ADEQ)

Official Photograph Sheet

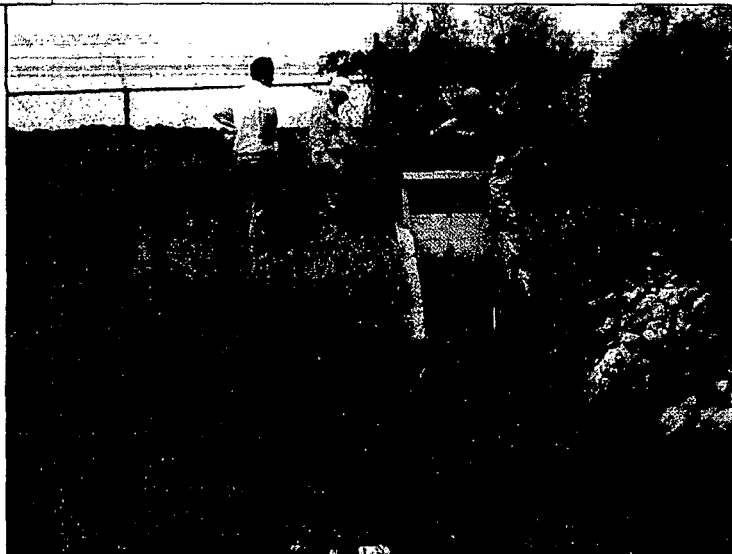
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	62	Of	67		Date:	28 AUG 07	Time:	1456
Description:	View to the left of photo 61 inside Process Building.							
								
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	63	Of	67		Date:	28 AUG 07	Time:	1500
Description:	Facing south inside Process Building, west side. Tank in foreground has approx. 7600 kilos of Liquid Bromine since Jan 07.							
								

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

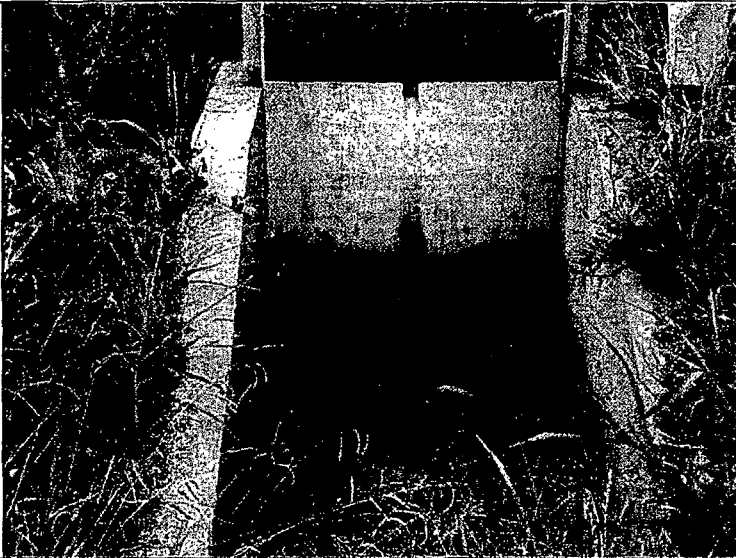
Location:	Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	64	Of	67		Date:		Time:	1506
Description:	Second floor of Process Building showing a Decanter with liquid still inside. Several were in this condition.							



Photographer:	Les Branscum, ADEQ				Witness:	Penny Wilson, ADEQ		
Photo #	65	Of	67		Date:	28 AUG 07	Time:	1530
Description:	Facing north on the north end of the Diaz property. ADEQ Water Inspector Brent Walker at left as Facility Trustee James Luker and former employee Ron Reid close the Facility storm water drain.							



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Location:		Diaz Intermediates Corp., 301 Wyanoke Rd., West Memphis, AR 72301							
Photographer:		Les Branscum, ADEQ				Witness:		Penny Wilson, ADEQ	
Photo #	66	Of	67		Date:	28 AUG 07	Time:	1537	
Description:		Storm drain gate almost closed but had to be hammered the last inch.							
									
Photographer:		Les Branscum, ADEQ				Witness:		Penny Wilson, ADEQ	
Photo #	67	Of	67		Date:	28 AUG 07	Time:	1550	
Description:		Storm drain fully closed with dirt pushed against it to help seal.							
